

Sheryl P. Giugliano
Michael S. Amato
RUSKIN MOSCOU FALTISCHEK, P.C.
1425 RXR Plaza
East Tower, 15th Floor
Uniondale, New York 11556
Telephone: 516-663-6600
sgiugliano@rmfpc.com
mamato@rmfpc.com
Attorneys for Debtor and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

ZHANG MEDICAL P.C., d/b/a
NEW HOPE FERTILITY CENTER,

Chapter 11

Case No. 23-10678-pb

Debtor.
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**SUPPLEMENTAL DECLARATION OF SHERYL P. GIUGLIANO IN SUPPORT OF
DEBTOR'S APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE
RETENTION AND EMPLOYMENT OF RUSKIN MOSCOU FALTISCHEK, P.C. AS
ATTORNEYS FOR DEBTOR EFFECTIVE AS OF JANUARY 4, 2024**

I, SHERYL P. GIUGLIANO, duly affirm under penalty of perjury that the following is true and correct:

1. I am a partner in the law firm of Ruskin Mosco Faltischek, P.C. ("RMF"), located at 1425 RXR Plaza, East Tower, 15th Floor, Uniondale, New York 11556, and have been duly admitted to practice law in the State of New York and the U.S. Court of Appeals for the Second Circuit, and the United States District Courts for the Southern, Eastern and Western Districts of New York. I am a member in good standing of the Bar of State of New York.

2. On February 2, 2024, the Court entered the *Order Authorizing Retention and Employment of Ruskin Moscou Faltischek, P.C. as Attorneys for Debtor* (ECF Doc. No. 232).

3. I respectfully submit this supplemental declaration ("Supplemental Declaration")

in support of the *Debtor's Application for Entry of an Order Authorizing the Retention and Employment of Ruskin Moscou Faltischek, P.C. as Attorneys for Debtor* (ECF Doc. No. 224) (the "Application").¹ Unless otherwise stated in this Supplemental Declaration, I have personal knowledge of the facts set forth herein. I will further supplement this Supplemental Declaration if additional relevant information becomes available during the pendency of this case.

4. RMF seeks to disclose a connection in the Debtor's case arising out of negotiations with Meyer Equities LLC ("Meyer Equities"), a potential new landlord introduced by the Debtor's proposed real estate broker, Savills, for possible new office space.

5. The principal of Meyer Equities is Eric Meyer. David Milner, a trusts and estates and tax partner at RMF consulted with Eric Meyer and his wife in or about March 2020, but RMF was not retained to perform any services. Approximately ten or more years ago, before joining RMF, Mr. Milner also performed some estate planning services for Martin Meyer and his wife, as well as Jodi Meyer. Eric Meyer is the son of Martin Meyer, and brother to Jodi Meyer. RMF has never worked with or for Meyer Equities, and Mr. Milner's work with Martin Meyer concluded by in or about 2013.

6. RMF does not believe that this connection is a disqualifying conflict for purposes of RMF's continued representation of the Debtor in this case. In the interests of disclosure, RMF is advising the Court and interested parties of this connection.

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 15, 2024
Uniondale, New York

/s/Sheryl P. Giugliano
Sheryl P. Giugliano

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.